

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTSUNITED STATES OF AMERICA)
)
v.)
)
HANA F. AL JADER)

Cr. No. 05-10085-RCL

ASSENTED TO MOTION TO CONTINUE STATUS CONFERENCE

Hana F. Al Jader (“the defendant”), by and through undersigned counsel, hereby submits this Motion to Continue the Status Conference from September 13, 2005 to September 27, 2005 or another date thereafter convenient to the court. The defendant also asks that the court designate the upcoming status conference as an **Interim Status Conference** rather than a Final Status Conference as currently listed on the docket. As the basis for this motion, the defendant notes that she retained undersigned counsel to represent her in this matter just within the past seven days. Undersigned counsel has not yet received the file in this matter from prior defense counsel. Undersigned counsel, therefore, needs time to obtain the file and properly evaluate the case.

The defendant notes further that prior defense counsel filed a discovery motion in this case. In fact, the government’s response to the discovery motion is due on August 12, 2005. The defendant’s new counsel has not yet reviewed this discovery motion. Consequently, undersigned counsel cannot yet assess whether to adopt the current discovery motion, supplement the current discovery motion, or supplant the current discovery motion with a new motion. In view of undersigned counsel’s need to obtain and review the discovery motion, the defendant asks that the court allow the government until **September 2, 2005** to respond to defendant’s discovery motion. During the intervening time period, undersigned counsel can properly assess how to proceed with

the discovery process and will, if necessary, furnish the government with supplemental or alternative discovery requests. By extending the government's response deadline until September 2, 2005, the court will allow the government sufficient time to respond to any supplemental or alternative discovery requests initiated by the defendant.

WHEREFORE, the defendant asks the court to grant her motion by (1) continuing the status conference set for September 13, 2005 to **September 27, 2005** or a date thereafter convenient to the court, (2) scheduling this matter as an **Interim** rather than Final Status Conference, and (3) extending the government's discovery response deadline until September 2, 2005. **The government assents to this motion.¹**

Dated: August 10, 2005

Respectfully submitted,

HANA F. AL JADER,
By her attorneys,

/s/ **Jeffrey A. Denner**

Jeffrey A. Denner, BBO#120520
Brad Bailey, BBO#549749
Gary G. Pelletier, BBO#631732
DENNER O'MALLEY, LLP
Four Longfellow Place, 35th Floor
Boston, MA 02114
(617) 227-2800

¹ The government predicates its assent to this motion upon an extension of its August 12, 2005 deadline to respond to the defendant's current discovery motion. Accordingly, the defendant asks the court to extend the government's response discovery response deadline to September 2, 2005 for the reasons outlined in the body of this motion.